

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

LIGHT OF THE WORLD GOSPEL
MINISTRIES, INC.,

Plaintiff,

V.

VILLAGE OF WALTHILL, NEBRASKA,

Defendant.

Case No. 8:18-cv-312

JOINT MOTION TO ENTER CONSENT DECREE

COME NOW the parties, Plaintiff Light of the World Gospel Ministries, Inc. (“LOTW” or the “Church”) and Defendant Village of Walthill, Nebraska (“Walthill” or the “Village”), and hereby jointly request the Court enter the proposed consent decree filed herewith, and state as follows:

1. After formal mediation followed by extensive negotiations the parties have agreed to settle this matter via the consent decree submitted with this motion. The consent decree resolves all outstanding issues between the parties and both parties have agreed to its terms as evidenced by their signatures thereon.

2. By the terms of the consent decree, the Village has agreed to permit the Church to construct its church facility and has signed the permits needed for the Church to do so, and has agreed to pay the Church a financial settlement. The payment will be made to the Court's registry and distributed by order of the Court. The Church has agreed to add certain design features to its facility, including separate commercial business entrances, and has agreed to operate two commercial businesses in its facility for an extended period of time in addition to using it for religious purposes.

3. The corresponding proposed consent order between the United States and the Village has been submitted to the court in *United States of America v. Village of Walthill, Nebraska*, Case No. 8:20-cv-69 (D. Neb.).

4. The parties respectfully request the Court sign and enter the proposed consent decree filed herewith.

DATED this 11th day of October, 2021.

Respectfully submitted,

VILLAGE OF WALTHILL, NEBRASKA,
Defendant,

LIGHT OF THE WORLD GOSPEL
MINISTRIES, INC, Plaintiff,

By:

s/ Jason W. Grams

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing joint motion to stay pending mediation has been filed in the Court's CM/ECF system which will effect service upon all counsel of record on this 11th day of October, 2021. The following individuals will be served with this document via regular US Mail, postage prepaid:

Bradley Irwin
615 6th Avenue
South Sioux City, NE 68776

s/ Jason W. Grams